

EXHIBIT “2”

800.211.DEPO (3376)
EsquireSolutions.com

SANTANA BRYSON
BRYSON vs ROUGH COUNTRY

April 12, 2023
5-8

<p style="text-align: right;">Page 5</p> <p>1 Procedure and the Federal Rules of Evidence.</p> <p>2 Based on counsel's prior statement, you</p> <p>3 want to state all objections on the record going</p> <p>4 forward?</p> <p>5 MS. CANNELLA: All objections that have to</p> <p>6 be preserved. Yes.</p> <p>7 CROSS-EXAMINATION</p> <p>8 BY MS. FERGUSON:</p> <p>9 Q All right. Mrs. Bryson, is it okay if I</p> <p>10 call you Santana?</p> <p>11 A Mm-hmm.</p> <p>12 Q Okay. Thank you.</p> <p>13 Santana, could you state your full name for</p> <p>14 the record, please?</p> <p>15 A Santana Sheree Bryson.</p> <p>16 Q And what is your date of birth?</p> <p>17 A 4/25/96.</p> <p>18 Q Okay. And I apologize in advance. Some of</p> <p>19 this is a little repetitive. But just for the</p> <p>20 record, I'm going to ask you some of the same</p> <p>21 questions that I know you heard me ask your husband</p> <p>22 Josh earlier. But just so we have a clear record,</p> <p>23 I'll have to repeat some of them.</p> <p>24 What is your current address?</p> <p>25 A 425 Chubbtown Road, Cedartown, Georgia</p>	<p style="text-align: right;">Page 7</p> <p>1 Q All right. And I know you heard some of</p> <p>2 the ground rules earlier. I'll go over it very</p> <p>3 quick. If you don't understand any of my questions,</p> <p>4 please let me know. Let's try not to talk over each</p> <p>5 other. Josh did a great job of waiting till I was</p> <p>6 done, and I tried to wait till he was done. I think</p> <p>7 it worked well. Just make sure to give verbal</p> <p>8 answers instead of just headshakes when you mean to</p> <p>9 give a "yes" or a "no" so the court reporter can take</p> <p>10 it all down.</p> <p>11 A Yes, ma'am.</p> <p>12 Q Is that understandable?</p> <p>13 A Mm-hmm.</p> <p>14 Q Okay. All right. Just a few questions</p> <p>15 about your, your personal background.</p> <p>16 Where were you born?</p> <p>17 A Rome, Georgia. At the Floyd hospital in</p> <p>18 Rome.</p> <p>19 Q Okay. Did you grow up in Rome?</p> <p>20 A Yes, ma'am. Technically Shannon, but yes.</p> <p>21 Q Where did you go to high school?</p> <p>22 A Model High School.</p> <p>23 Q What is that?</p> <p>24 A Model High School.</p> <p>25 Q Model?</p>
<p style="text-align: right;">Page 6</p> <p>1 30125.</p> <p>2 Q Okay. And you've lived at that address, it</p> <p>3 sounds like, since about July of 2020?</p> <p>4 A Yes.</p> <p>5 Q Okay. All right. And you live there with</p> <p>6 your husband and your two children?</p> <p>7 A Yes, ma'am.</p> <p>8 Q Okay. And as you know after sitting</p> <p>9 through the deposition earlier today, and I'm sure</p> <p>10 your lawyers have talked with you about this, but I'm</p> <p>11 here today to ask you some questions related to the</p> <p>12 lawsuit that's been filed against my client Rough</p> <p>13 Country.</p> <p>14 And I am very deeply sorry for your loss.</p> <p>15 I can't imagine what you have been through; you and</p> <p>16 your husband. And I apologize in advance for having</p> <p>17 to ask some of the questions that I'm going to ask</p> <p>18 you per the gist of it. So I don't mean to be</p> <p>19 intrusive or upset you, though I know this process is</p> <p>20 upsetting by the nature of what we have to cover.</p> <p>21 Unfortunately, this is just part of the process.</p> <p>22 And if you need to take a break at any</p> <p>23 time, please let me know. We can do so whenever you</p> <p>24 need a break. Okay?</p> <p>25 A Okay.</p>	<p style="text-align: right;">Page 8</p> <p>1 A Yes. M-O-D-E-L.</p> <p>2 Q Okay. Got it.</p> <p>3 And did you graduate?</p> <p>4 A Yes, ma'am.</p> <p>5 Q What year?</p> <p>6 A 2015.</p> <p>7 Q Is that in Shannon, or Rome, Georgia?</p> <p>8 A I think they clarify it as Rome.</p> <p>9 Q Okay. Did you attend any college after</p> <p>10 high school?</p> <p>11 A No, ma'am.</p> <p>12 Q What did you do for employment after high</p> <p>13 school?</p> <p>14 A After high school, I was a waitress at</p> <p>15 Steak 'n Shake. And then I was -- had multiple jobs.</p> <p>16 I went from Zaxby's to Steak 'n Shake to daycare</p> <p>17 operator. And then when I moved from Rome to</p> <p>18 Blairsville, I worked at Wal-Mart.</p> <p>19 Q Okay. And is that when you met your</p> <p>20 husband Josh?</p> <p>21 A Mm-hmm.</p> <p>22 Q Okay. And remind me.</p> <p>23 Was that 2017?</p> <p>24 A It was 2016.</p> <p>25 Q 2016.</p>

SANTANA BRYSON
BRYSON vs ROUGH COUNTRY

April 12, 2023

9-12

<p style="text-align: right;">Page 9</p> <p>1 A September of 2016.</p> <p>2 Q Okay. And so that's when you moved to</p> <p>3 Blairsville and interviewed and got the job at</p> <p>4 Wal-Mart?</p> <p>5 A Yes, ma'am.</p> <p>6 Q And, and you all started dating shortly</p> <p>7 thereafter?</p> <p>8 A Yes. We -- it was like October the 3rd, I</p> <p>9 want to say, we made it official.</p> <p>10 Q And how long did you work at Wal-Mart?</p> <p>11 A I want to say like four to six months.</p> <p>12 Because I got pregnant with Cohen and I had to come</p> <p>13 out of work on maternity leave because I had</p> <p>14 hyperemesis with him.</p> <p>15 Q Were you on bedrest?</p> <p>16 A Not bedrest, but I was just so nauseous I</p> <p>17 couldn't work. Like I couldn't be in -- I worked in</p> <p>18 the deli and I couldn't go to work and do what I did</p> <p>19 every day, so I just -- I really just had to quit. I</p> <p>20 really didn't go on maternity leave.</p> <p>21 Q And did you work in the deli the whole time</p> <p>22 you worked at Wal-Mart?</p> <p>23 A I was first hired on as a cashier. But</p> <p>24 when our relationship became public, I had to be</p> <p>25 transferred cause he was my boss.</p>	<p style="text-align: right;">Page 11</p> <p>1 Q Okay. And what was your job there?</p> <p>2 A I was on the drive-thru because I couldn't</p> <p>3 waitress being pregnant.</p> <p>4 Q Okay. Did you have the same sickness with</p> <p>5 the second pregnancy?</p> <p>6 A I've had it with all three of my children.</p> <p>7 Yes.</p> <p>8 Q Okay. And are you currently employed?</p> <p>9 A No. I stay at home and take care of our</p> <p>10 kids.</p> <p>11 Q Okay. Any jobs since the Steak 'n Shake</p> <p>12 job?</p> <p>13 A Not since the car wreck. No.</p> <p>14 Q Okay. All right.</p> <p>15 A I tried to go back to work, but I couldn't</p> <p>16 mentally do it. Leaving Chandler at home and</p> <p>17 wondering if he was okay, I just couldn't; not, not</p> <p>18 after the car wreck happened.</p> <p>19 Q Okay. Before the car wreck, did you all</p> <p>20 use daycare for --</p> <p>21 A No.</p> <p>22 Q -- Cohen?</p> <p>23 A My grandmother would watch him.</p> <p>24 Q Okay.</p> <p>25 A My -- Rissa. That Josh said --</p>
<p style="text-align: right;">Page 10</p> <p>1 Q Okay.</p> <p>2 A So cashier for maybe two weeks, three</p> <p>3 weeks, and then transferred to the deli. After that,</p> <p>4 I was in the deli for -- till I went out on leave.</p> <p>5 Q Okay. And Cohen, I believe, was born in</p> <p>6 February of 2018?</p> <p>7 A Yes. February 15th, 2018.</p> <p>8 Q Okay. And so how far before his birth do</p> <p>9 you think you went out due to the pregnancy and the</p> <p>10 nausea?</p> <p>11 A Like I said, I was like four to six months</p> <p>12 pregnant. So probably -- I'm not sure, to be honest.</p> <p>13 Q Okay. All right. And, and then as far as</p> <p>14 employment after Wal-Mart before this accident in</p> <p>15 March of 2020, did you have any other jobs?</p> <p>16 A Yes. I worked at Wal-Mart again for a</p> <p>17 short period of time and then went back at Steak 'n</p> <p>18 Shake because I liked the work better. The work -- I</p> <p>19 can't think of the word right now, but I liked the</p> <p>20 work situation a lot better at Steak 'n Shake than at</p> <p>21 Wal-Mart.</p> <p>22 Q Okay. And that was after Cohen was born?</p> <p>23 A After Cohen. Yes. I was currently working</p> <p>24 at Steak 'n Shake when the wreck had happened. I</p> <p>25 literally worked the night before.</p>	<p style="text-align: right;">Page 12</p> <p>1 Q Rissa?</p> <p>2 A -- earlier. Yes.</p> <p>3 Q Okay.</p> <p>4 A Cause we lived with her and it was just</p> <p>5 easier to get her to watch him.</p> <p>6 Q Okay. I forgot to ask Josh this question,</p> <p>7 but -- and this is for purposes of if we have to pick</p> <p>8 a jury if this case goes to trial. And the case is</p> <p>9 pending in the Northern District of Georgia in the</p> <p>10 Gainesville Division, which is made up of a bunch of</p> <p>11 counties. So I'm trying to find out if you have</p> <p>12 relatives in these counties so in the jury selection</p> <p>13 process we could figure that out.</p> <p>14 A I should not -- I'm sorry for interrupting</p> <p>15 you -- but Josh may.</p> <p>16 Q Yeah. So let me, let me mention the</p> <p>17 counties to you first. It's Banks, Barrow, Dawson,</p> <p>18 Fannin, Forsyth, Gilmer, Habersham, Hall, Jackson,</p> <p>19 Lumpkin, Pickens, Rabun, Stephens, Towns, Union, and</p> <p>20 White counties. I know that's a lot.</p> <p>21 A I do not. I know he does have family in</p> <p>22 Union County, I believe it is.</p> <p>23 Q Okay.</p> <p>24 A His grandmother.</p> <p>25 Q Okay. And what's her name?</p>

SANTANA BRYSON
BRYSON vs ROUGH COUNTRYApril 12, 2023
13-16

<p style="text-align: right;">Page 13</p> <p>1 A Goldie.</p> <p>2 Q Goldie?</p> <p>3 A Yeah. Goldie Nichols and Sam Nichols. His</p> <p>4 grandparents live in Union. And then he's got</p> <p>5 cousins that live in Union. And I know he's got</p> <p>6 cousins on his mom's side, but I don't know where</p> <p>7 they live.</p> <p>8 Q And those ones are in Union also, or</p> <p>9 somewhere else?</p> <p>10 A I don't know where they -- yeah.</p> <p>11 Q Okay.</p> <p>12 A I don't know. I don't know where they</p> <p>13 live.</p> <p>14 Q That's okay.</p> <p>15 A I know they live like an hour from</p> <p>16 Blairsville because whenever we get together for</p> <p>17 Easter events, you know, we always are trying to rush</p> <p>18 away. But I don't know where they live exactly. No.</p> <p>19 Q Okay. Do you know the last name of any of</p> <p>20 the cousins that you just mentioned? Are they</p> <p>21 Brysons, or a different name?</p> <p>22 A I'm, I'm assuming they're Nichols cause</p> <p>23 after his uncle.</p> <p>24 Q Okay.</p> <p>25 A I don't really talk to a lot of his family</p>	<p style="text-align: right;">Page 15</p> <p>1 morning of that morning?</p> <p>2 A We just got ready. And he ate cereal</p> <p>3 and -- sorry.</p> <p>4 Q It's okay.</p> <p>5 A I can't talk about him and not cry, so hold</p> <p>6 on. He was being really good that morning. He would</p> <p>7 eat his cereal and we just got ready to go to his</p> <p>8 nana's. And it was like any other normal day.</p> <p>9 Q Okay. Do you remember what time you all</p> <p>10 headed up to the -- to nana's house?</p> <p>11 A It was after 11 because I had to make a</p> <p>12 shirt. I do shirt sometimes; like make shirts. And</p> <p>13 I had to get one done for a lady. I remember I had</p> <p>14 to do that first before we could leave, so it was</p> <p>15 after 11.</p> <p>16 Q Okay. And did you drive going up there, if</p> <p>17 you remember?</p> <p>18 A Yes. I usually drive.</p> <p>19 Q Okay. And so if you left after 11, it</p> <p>20 sounds like you all would have arrived at --</p> <p>21 A Between like 12, 1 o'clock, depending on</p> <p>22 how long we -- not 12, but like 1 and 2 o'clock.</p> <p>23 Because it's usually like an hour-and-a-half,</p> <p>24 two-hour drive, depending if we had to stop, you</p> <p>25 know, if he needed to get out and we needed to use</p>
<p style="text-align: right;">Page 14</p> <p>1 cause I don't like them, so... not like that anyways.</p> <p>2 Like we're not close. I just tolerate them on family</p> <p>3 stuff.</p> <p>4 Q Okay. Any prior marriages before Josh?</p> <p>5 A No.</p> <p>6 Q Okay. And we've talked about Cohen a</p> <p>7 little bit so far. And I, obviously, covered with</p> <p>8 Josh Chandler and then Cambrie.</p> <p>9 A Mm-hmm.</p> <p>10 Q Am I saying --</p> <p>11 A Cambrie. Yeah.</p> <p>12 Q Cambrie. Okay.</p> <p>13 Any other children --</p> <p>14 A Uh-uh.</p> <p>15 Q -- prior to those three?</p> <p>16 A No.</p> <p>17 Q Okay. All right. I want to move to the</p> <p>18 day of the accident, so March 15th, 2020. Based on</p> <p>19 the interrogatories that have been answered, it</p> <p>20 sounds like you all went to a birthday party at</p> <p>21 Josh's mom's house.</p> <p>22 So your mother-in-law's house?</p> <p>23 A Mm-hmm.</p> <p>24 Q Prior to going to her house that day, do</p> <p>25 you have any memory of what you all did early in the</p>	<p style="text-align: right;">Page 16</p> <p>1 the bathroom or I got to check with the baby. So</p> <p>2 between like 2, I would say, is around the time we</p> <p>3 got there.</p> <p>4 Q Okay. And what do you remember doing at</p> <p>5 the party as far as activities, meals, barbecue,</p> <p>6 cookout; stuff like that?</p> <p>7 A I mean, we just ate and sang happy birthday</p> <p>8 and played out in the yard with the kids. And then</p> <p>9 after, like, the extended family left, it was just</p> <p>10 his, like, mom and brothers and sisters. We just sat</p> <p>11 in the house. And he was playing games with his</p> <p>12 little brother and the kids were playing -- like</p> <p>13 Cohen and Kinley were playing. And then I was</p> <p>14 watching American Idol on the couch.</p> <p>15 And that's why we didn't leave until later</p> <p>16 is cause I wanted to finish American Idol and he</p> <p>17 wanted to play one more game with his little brother.</p> <p>18 So that's -- after American Idol we left; about</p> <p>19 10:30.</p> <p>20 Q And when you say he was playing with his</p> <p>21 little brother, are you talking about Josh?</p> <p>22 A Josh. Yeah. Josh was playing with his</p> <p>23 brother on the game. And then Cohen was playing with</p> <p>24 our niece Kinley.</p> <p>25 Q Okay. And whose daughter is Kinley?</p>

SANTANA BRYSON
BRYSON vs ROUGH COUNTRY

April 12, 2023
17-20

<p style="text-align: right;">Page 17</p> <p>1 A Kristin Williams is her name now. She's</p> <p>2 not a Bryson no more.</p> <p>3 Q And she is Josh's sister?</p> <p>4 A Yes.</p> <p>5 Q How old is Kinley?</p> <p>6 A She would be five this year cause we -- she</p> <p>7 was born after Cohen was.</p> <p>8 Q Okay. And Josh was playing games with his</p> <p>9 brother?</p> <p>10 A Tyler Young.</p> <p>11 Q Tyler Young?</p> <p>12 A Yeah; on the Xbox.</p> <p>13 Q Okay. I was going to ask you what game.</p> <p>14 So Xbox. Got it.</p> <p>15 And so you waited to finish watching</p> <p>16 American Idol and then left after that?</p> <p>17 A Yes, ma'am.</p> <p>18 Q Okay. And do you, as we sit here today,</p> <p>19 have a memory of getting in the car and --</p> <p>20 A Mm-hmm.</p> <p>21 Q -- Cohen being buckled into his car seat?</p> <p>22 A Yes, ma'am. My mother-in-law Gretta, she</p> <p>23 put him in the car seat and they gave him hugs and</p> <p>24 kisses. And if I remember correctly, I'm pretty sure</p> <p>25 Josh checked cause I was already in the car cause I</p>	<p style="text-align: right;">Page 19</p> <p>1 had stopped, at the end of her driveway, and we</p> <p>2 switched.</p> <p>3 And that's when I seen that Cohen was</p> <p>4 asleep in the rearview mirror. We didn't check on</p> <p>5 him, but we drove down the dirt road and we went down</p> <p>6 that. It's complicated. But if you look up on the</p> <p>7 maps, we went down that one road and we were at the</p> <p>8 stop sign of the blossom -- I don't think it's</p> <p>9 Blossom Valley cause where she lives -- I don't know.</p> <p>10 But there's, like -- it's a dirt road and then a</p> <p>11 road. We got on the actual paved road. And</p> <p>12 that's when we noticed, oh, he's already asleep; that</p> <p>13 was quick, you know. And then we just headed on from</p> <p>14 there.</p> <p>15 Q So within a couple of minutes of getting in</p> <p>16 the car he'd fallen asleep?</p> <p>17 A Yeah. He was gone. He hadn't taken a nap</p> <p>18 all day. He had played himself. He was tired.</p> <p>19 Q Okay. And then while you were driving</p> <p>20 could you see -- he was, he was seated behind you;</p> <p>21 Cohen was, correct?</p> <p>22 A Yes, ma'am.</p> <p>23 Q Could you see him in the rear view mirror</p> <p>24 while you were driving?</p> <p>25 A Yes, ma'am.</p>
<p style="text-align: right;">Page 18</p> <p>1 was pregnant with Chandler and I was nauseous. And I</p> <p>2 remember Josh going and checking after Gretta and</p> <p>3 Dusty had gave him, you know, goodbye kisses and</p> <p>4 loves, because one of us always checked the car seat.</p> <p>5 Q Okay. And did you start out in the</p> <p>6 passenger seat?</p> <p>7 A I did cause I was feeling sick.</p> <p>8 Q Okay. And then why did you decide to</p> <p>9 change --</p> <p>10 A Because --</p> <p>11 Q -- to the driver? Sorry.</p> <p>12 A -- Josh was on his phone playing Spotify.</p> <p>13 He had just downloaded Spotify and I didn't want him</p> <p>14 to be trying to pick a song while we were driving.</p> <p>15 I'd rather just drive feeling sick than me worried</p> <p>16 about him having a wreck, to be honest. Plus, I'm a</p> <p>17 better driver.</p> <p>18 Q And where did you -- where do you recall</p> <p>19 that you all switched from driver to passenger, and</p> <p>20 vice versa, seats?</p> <p>21 A So the way his mother-in-law's driveway is,</p> <p>22 it's a road; like a dirt road to her house. So we</p> <p>23 were going down that road and he was driving. We</p> <p>24 stopped at the end of her road and there's an actual,</p> <p>25 like, paved road that you go down. That's where we</p>	<p style="text-align: right;">Page 20</p> <p>1 Q And was he asleep, to your knowledge, up</p> <p>2 until the accident?</p> <p>3 A Yes, ma'am.</p> <p>4 Q Okay. Did he -- do you know if he, like,</p> <p>5 had a paci or anything like that --</p> <p>6 A No.</p> <p>7 Q -- with him in the car seat? "No"?</p> <p>8 A He didn't, he didn't take paci since a year</p> <p>9 old. And he didn't take a bottle since a year old</p> <p>10 either. We took those away at a year old.</p> <p>11 Q Okay. And could you tell he was asleep</p> <p>12 just cause his eyes were shut, or was he sort of,</p> <p>13 like, leaned over or --</p> <p>14 A He -- his eyes were shut and he was to the</p> <p>15 side.</p> <p>16 Q Is that to the right? If you're in the</p> <p>17 seat --</p> <p>18 A Yes.</p> <p>19 Q -- to his right?</p> <p>20 A In the mirror, he was on the right. Like I</p> <p>21 was looking in the rearview mirror and his head was</p> <p>22 to the right-hand side.</p> <p>23 Q Okay. But so if you're -- if you are Cohen</p> <p>24 sitting in the car seat, if you're directing which</p> <p>25 way his head was tipped would it be, like, his right</p>

SANTANA BRYSON
BRYSON vs ROUGH COUNTRYApril 12, 2023
21-24

<p style="text-align: right;">Page 21</p> <p>1 as he's sitting?</p> <p>2 A Yes.</p> <p>3 Q Okay. Like toward the center of the</p> <p>4 vehicle?</p> <p>5 A Yes, yes.</p> <p>6 Q Sorry. Just making sure.</p> <p>7 A Sorry.</p> <p>8 Q No. That's okay. It is confusing cause</p> <p>9 I'm thinking --</p> <p>10 A The mirror. The mirror. Yeah.</p> <p>11 Q -- the mirror. Okay.</p> <p>12 Okay. And then anything in particular you</p> <p>13 remember about the drive from the road where you all</p> <p>14 switched spots to the light where you stopped before</p> <p>15 the accident?</p> <p>16 A Yes. I remember going down Blue Ridge</p> <p>17 Highway and passing -- like there's a Mexican</p> <p>18 restaurant and a shopping center and then, like, a</p> <p>19 Taco Bell. So, like, I want to say a red light or</p> <p>20 two red lights before where the red light of the</p> <p>21 accident happened --</p> <p>22 Q Mm-hmm.</p> <p>23 A -- I remember passing through there and</p> <p>24 having -- I had passed one vehicle. It was a small</p> <p>25 car. And then I remember telling Josh, there's</p>	<p style="text-align: right;">Page 23</p> <p>1 noticed the bright lights and then when the actual</p> <p>2 accident occurred?</p> <p>3 MS. CANNELLA: Objection. Calls for</p> <p>4 speculation.</p> <p>5 THE WITNESS: Yeah. I'm not sure.</p> <p>6 Q (BY MS. FERGUSON) Okay. When the accident</p> <p>7 occurred, you were -- were you stopped at a red light?</p> <p>8 A I don't remember even getting to that red</p> <p>9 light.</p> <p>10 Q You --</p> <p>11 A The last thing I remember is passing the</p> <p>12 Taco Bell and saying what I said to Josh.</p> <p>13 Q Okay.</p> <p>14 A That's literally the last thing I remember</p> <p>15 from the car wreck.</p> <p>16 Q Okay.</p> <p>17 A And the next thing I remember, waking up in</p> <p>18 the hospital; like a scary move. There was no</p> <p>19 nurses, no doctors, no Josh, no Cohen. Nobody was</p> <p>20 around me.</p> <p>21 Q So the last thing you remember is passing</p> <p>22 the Taco Bell.</p> <p>23 And you're in the left lane, you're moving,</p> <p>24 and you noticed the bright lights coming up on you?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 22</p> <p>1 somebody flying up behind me with their bright lights</p> <p>2 on. Like they were, you know, come -- they came out</p> <p>3 of nowhere. And I told him that, but I did not</p> <p>4 actually -- like I said, all I seen was bright</p> <p>5 lights. I didn't see nothing else. And that's all I</p> <p>6 remember.</p> <p>7 Q Okay. And when the, the truck came flying</p> <p>8 up towards you with the bright lights, were you in</p> <p>9 the left lane at that time?</p> <p>10 A Yes; the left fast lane.</p> <p>11 Q Okay. Was that same truck behind you at</p> <p>12 those other lights that you passed through?</p> <p>13 A Not to my knowledge. Like I said, he</p> <p>14 came -- or they came flying up behind me. All I seen</p> <p>15 was it was dark one minute. Next thing I know, I</p> <p>16 seen bright lights and they were coming up fast.</p> <p>17 Q Okay. And at that point in time when you</p> <p>18 first noticed the lights, were you driving, or</p> <p>19 stopped?</p> <p>20 A I was driving and I -- you know when you're</p> <p>21 driving you can look in your rearview. That's when I</p> <p>22 noticed. Cause it -- there was no light. And then,</p> <p>23 next thing I know, there was bright lights.</p> <p>24 Q Okay. And then just a rough estimate.</p> <p>25 How much time between when you first</p>	<p style="text-align: right;">Page 24</p> <p>1 Q Okay. Okay. So you -- and I just want to</p> <p>2 make sure I have this right cause, obviously, if</p> <p>3 there's memories of stuff at the scene, I need to ask</p> <p>4 you about it.</p> <p>5 A That's fine.</p> <p>6 Q I'm not trying to pester you or bother you,</p> <p>7 but just so I can check the box on making sure I've</p> <p>8 covered this.</p> <p>9 So you don't remember being stopped at the</p> <p>10 light before the impact, correct?</p> <p>11 A No, ma'am.</p> <p>12 Q Okay. And you don't remember the actual</p> <p>13 impact itself?</p> <p>14 A No. I have no recollection of anything --</p> <p>15 Q Don't --</p> <p>16 A -- regarding the wreck at all.</p> <p>17 Q At all.</p> <p>18 Okay. And don't remember, like, how you</p> <p>19 got out of the car, walking --</p> <p>20 A No.</p> <p>21 Q -- the scene; anything like that?</p> <p>22 A Only information that I've gained is from</p> <p>23 what others have informed me like our witnesses we've</p> <p>24 had, doctors we've had, like our family that --</p> <p>25 people that told our families what happened. Those</p>

SANTANA BRYSON
BRYSON vs ROUGH COUNTRY

April 12, 2023
25-28

<p style="text-align: right;">Page 25</p> <p>1 are the only memories that I've had.</p> <p>2 Q Okay. And you have no memory, just to</p> <p>3 confirm, no memory of seeing Cohen at the scene?</p> <p>4 A No.</p> <p>5 Q Okay. I'm not asking for anything that</p> <p>6 your lawyers have told you, but what have you learned</p> <p>7 through witnesses at the scene about, you know, what</p> <p>8 happened and how you got out of the vehicle; things</p> <p>9 like that?</p> <p>10 A From what one of the witnesses -- we were</p> <p>11 told, he stopped -- you know, he was coming from,</p> <p>12 like, Talking Rock area, like, going towards</p> <p>13 Blairsville. He was coming through that lane. He</p> <p>14 didn't witness the wreck happen. He came up on it</p> <p>15 right after it happened is what he told me. His name</p> <p>16 is Tommy.</p> <p>17 Q Okay.</p> <p>18 A And he said that he ran over there to make</p> <p>19 sure there was nothing on fire. And then he said</p> <p>20 Josh was walking around outside the vehicle making</p> <p>21 calls to, like, the ambulance. I don't know. I just</p> <p>22 know that he said that he was trying to make Josh sit</p> <p>23 down and Josh wouldn't sit down. And then he come to</p> <p>24 check on me and Cohen cause we couldn't get out the</p> <p>25 car.</p>	<p style="text-align: right;">Page 27</p> <p>1 A Yes.</p> <p>2 Q Tommy.</p> <p>3 And what's his last name?</p> <p>4 A Tommy Nelson.</p> <p>5 Q Tommy Nelson.</p> <p>6 A He's the one that we met in Florida -- or</p> <p>7 Myrtle Beach.</p> <p>8 Q Okay. Is he also -- is he the person -- I</p> <p>9 might be confusing witnesses, but that -- Josh talked</p> <p>10 about someone that was a firefighter or something</p> <p>11 else.</p> <p>12 A Yeah. He got the name wrong earlier. It</p> <p>13 wasn't -- I think he said Thomas. It's not Thomas.</p> <p>14 It's Tommy Nelson. And he was the -- yes -- the</p> <p>15 firefighter; the volunteer firefighter. Yes.</p> <p>16 Q Okay. So Tommy Nelson is the volunteer</p> <p>17 firefighter?</p> <p>18 A And he didn't want to be involved because</p> <p>19 it -- he said it traumatized him. That's why he</p> <p>20 wouldn't answer back to us.</p> <p>21 Q And where does he live, to your knowledge?</p> <p>22 A Tennessee.</p> <p>23 Q Tennessee?</p> <p>24 A Yeah. He was visiting family as well and</p> <p>25 they were on their way back home.</p>
<p style="text-align: right;">Page 26</p> <p>1 And he said he checked for Cohen's pulse</p> <p>2 and he didn't feel anything. And then he told us he</p> <p>3 didn't want to move him just in case he was wrong and</p> <p>4 he didn't want to jar anything. But he said that I</p> <p>5 was frantic and I wanted to get him out, and so he</p> <p>6 helped me pull him through; like he unbuckled him.</p> <p>7 Hold on.</p> <p>8 Q It's okay. Take your time.</p> <p>9 A He unbuckled him and handed him to me and I</p> <p>10 just held him until the ambulance came. And he said</p> <p>11 the ambulance started CPR on him, but he was gone.</p> <p>12 And they took Josh to the ambulance and me in the</p> <p>13 ambulance and that's all he remembered. He said that</p> <p>14 I got to hold him one last time. I was just rocking</p> <p>15 him and Josh was calling everybody. That's, that's</p> <p>16 what he said. He said that the truck had ran over us</p> <p>17 and he was just focused on helping us and not worried</p> <p>18 about the other person involved.</p> <p>19 Q And that -- the person that gave you this</p> <p>20 information, you said his name was Tommy?</p> <p>21 A Yes. Tommy Nelson.</p> <p>22 Q Tommy Nelson.</p> <p>23 There's a guy named Thomas Richard Barker.</p> <p>24 A I didn't talk to him.</p> <p>25 Q So this is a different person?</p>	<p style="text-align: right;">Page 28</p> <p>1 Q Do you know where he lives in Tennessee?</p> <p>2 A No, ma'am.</p> <p>3 Q And -- but you all have, it sounds like,</p> <p>4 some sort of contact information for him; a phone or</p> <p>5 an e-mail or something?</p> <p>6 A I have his, his wife on Facebook. Josh has</p> <p>7 his number. But he won't respond back to either. We</p> <p>8 just thanked him when we met him in person in Myrtle</p> <p>9 Beach and we ain't really talked to him since.</p> <p>10 MS. FERGUSON: Okay. I could be wrong,</p> <p>11 but, Tedra, I don't think I've seen his name</p> <p>12 identified in discovery and where -- if you guys</p> <p>13 could just, if he hasn't been identified,</p> <p>14 supplement with whatever contact information you</p> <p>15 have, please.</p> <p>16 MS. CANNELLA: Absolutely.</p> <p>17 MS. FERGUSON: Thank you.</p> <p>18 Q (BY MS. FERGUSON) Were there any other scene</p> <p>19 witnesses that you recall that you talked to that gave</p> <p>20 you information about what happened at the scene?</p> <p>21 A That's the only person that I've spoke to</p> <p>22 is Tommy. I ain't spoke to anybody else.</p> <p>23 Q And did -- the information that you just</p> <p>24 told me about, did he tell you that on the phone, or</p> <p>25 when you saw him in Myrtle Beach, or some other time?</p>

SANTANA BRYSON
BRYSON vs ROUGH COUNTRYApril 12, 2023
29-32

<p style="text-align: right;">Page 29</p> <p>1 A When we see him at Myrtle Beach he told us.</p> <p>2 Q Okay.</p> <p>3 A We asked him -- we were actually leaving to</p> <p>4 go home. And he stopped and met us at a candy store</p> <p>5 and told us word for word, you know, his point of</p> <p>6 view on the whole situation. Cause we wanted answers</p> <p>7 we hadn't -- you know, we didn't get clarity from</p> <p>8 what the police officers told us. He was there the</p> <p>9 whole time, so he knew what the police officers knew.</p> <p>10 Q What did, what did he tell you as far as,</p> <p>11 you know, giving you some clarity and knowing more</p> <p>12 about police officers --</p> <p>13 A Just me holding my kid one more time.</p> <p>14 Q Okay.</p> <p>15 A Cause I didn't know I got to hold him.</p> <p>16 Cause he was pulled off the plug before they even let</p> <p>17 me see him.</p> <p>18 Q What, what did you just say? I'm sorry. I</p> <p>19 couldn't --</p> <p>20 A He was pulled off the ventilator before</p> <p>21 they let me see him. They wouldn't, they wouldn't</p> <p>22 even tell me he was passed. I just wanted to know if</p> <p>23 I got to hold him and tell him I loved him and stuff</p> <p>24 before.</p> <p>25 Q And, and how -- what's your recollection of</p>	<p style="text-align: right;">Page 31</p> <p>1 day?</p> <p>2 A No. Like I said, he said that it really</p> <p>3 traumatized him and he doesn't like to think about</p> <p>4 it. That's the way he said that day. Like he, he</p> <p>5 says he does not know how we function.</p> <p>6 Q And so your first memory after impact after</p> <p>7 the accident was waking up in the hospital?</p> <p>8 A Yes, ma'am.</p> <p>9 Q And do you know if it was Fannin?</p> <p>10 A It was Fannin --</p> <p>11 Q Okay.</p> <p>12 A -- cause I had to be airlifted from Fannin</p> <p>13 to Erlanger.</p> <p>14 Q Okay. And when you were airlifted, did</p> <p>15 Josh -- was he with you, or did he go by ambulance?</p> <p>16 A He had to go by ambulance.</p> <p>17 Q Okay. And do you remember being airlifted?</p> <p>18 I mean, were you --</p> <p>19 A Yeah.</p> <p>20 Q At that point you remembered things?</p> <p>21 A I remem -- I was going in and out, but I</p> <p>22 remember them telling me you're about to be airlifted</p> <p>23 into the helicopter. And then I passed out again.</p> <p>24 Then I woke back up being on the bed and they were</p> <p>25 wheeling me outside to the helicopter. And then</p>
<p style="text-align: right;">Page 30</p> <p>1 how you all and Tommy figured out that you all had</p> <p>2 met at the scene of the accident?</p> <p>3 A We were walking across to go to the parking</p> <p>4 deck from our hotel cause our hotel's parking deck</p> <p>5 was across the street. And God knew we needed it.</p> <p>6 And there he was pulling out. And he rolled his</p> <p>7 window down and he was, like, I can't believe it's</p> <p>8 you all. And I didn't know who he was cause I've,</p> <p>9 I've never seen pictures of him. I just heard his</p> <p>10 name from him talking to Josh. He texted Josh or</p> <p>11 called Josh or something.</p> <p>12 And I didn't know who he was. I was like,</p> <p>13 we're, like, hours away from home. How does he know</p> <p>14 us? And turns out he was the guy that, you know,</p> <p>15 helped us out in our worst moments of our life. And</p> <p>16 he just explained the situation and told us who he</p> <p>17 was. Josh was like, yeah, I know who you are now.</p> <p>18 Like -- and like, thank you, man.</p> <p>19 And, like, he was -- literally had people</p> <p>20 behind him in the parking deck pulling out, so he</p> <p>21 gave Josh his number. And, you know, we -- I was,</p> <p>22 like, just text him and see if he can tell -- talk to</p> <p>23 us. And he did. Met him down the road and we sat</p> <p>24 and talked for like two hours.</p> <p>25 Q Any other conversations with him since that</p>	<p style="text-align: right;">Page 32</p> <p>1 passing out again and waking up and telling them that</p> <p>2 I felt like I was going to throw up, so they gave me</p> <p>3 some pain medication and some Zofran in the</p> <p>4 helicopter. And then I remember, I remember, I</p> <p>5 remember passing out again and then just being back</p> <p>6 in the hospital at a new hospital; a different</p> <p>7 hospital.</p> <p>8 Q And based on what Josh told me earlier,</p> <p>9 Chandler was born on March 20th?</p> <p>10 A Yes.</p> <p>11 Q Okay. So five days after the accident?</p> <p>12 A Yes. I labored for five days.</p> <p>13 Q Okay.</p> <p>14 A They wanted to keep him in as long as</p> <p>15 possible cause he was so underdeveloped.</p> <p>16 Q And then I know I covered this with Josh a</p> <p>17 bit earlier.</p> <p>18 Chandler stayed in the NICU for several</p> <p>19 months, right?</p> <p>20 A It was four months. Yeah.</p> <p>21 Q Four months? Okay.</p> <p>22 A Yeah.</p> <p>23 Q And you guys stayed in a hotel during that</p> <p>24 time?</p> <p>25 A Yes. The Ronald McDonald House helped us</p>

SANTANA BRYSON
BRYSON vs ROUGH COUNTRY

April 12, 2023
33-36

<p style="text-align: right;">Page 33</p> <p>1 out with that. They -- since during -- it was COVID, 2 they couldn't have, they couldn't have everybody stay 3 at the Ronald McDonald House, so they put us in 4 hotels on different floors with other families that 5 were, you know, there with other things, other 6 children. So they, they really helped us out a lot 7 doing that. 8 Q And it sounds like Chandler is -- he's not 9 in preschool now. He's home. 10 You take care of him? 11 A Yeah. I take care of him. 12 Q And, overall, how is he doing? 13 A He's doing good. He has an allergy to eggs 14 due to him being premature, but they said he'll grow 15 out of it. And he's a little bit on the smaller 16 side, but, again, due to premature. But he's just 17 like any other three year old. Drives us crazy. 18 Q Good to hear. 19 Did you say allergy to eggs due to being 20 premature? 21 A Yes. 22 Q Okay. Got it. 23 A That is the only complication he has at the 24 moment. 25 Q Okay.</p>	<p style="text-align: right;">Page 35</p> <p>1 Q (BY MS. FERGUSON) Okay. Just before we took 2 a break I was turning to Exhibit 3. And if you could 3 look at page 2, there's a response identifying items in 4 the trunk of the Escape on the date of impact. 5 And then do you see the list? 6 A Yes, ma'am. 7 Q Okay. Do you remember which side of the 8 cargo area the shop vac was on? 9 A No, ma'am. 10 Q What about the umbrella stroller? Do you 11 remember where it was positioned in the cargo area of 12 the Escape? 13 A No. 14 Q What about the camping chairs? Any memory 15 of where they were positioned in the cargo area? 16 A Most of the stuff was in the back. 17 Q When you say "back," what do you mean by 18 that? 19 A In the, the trunk of the car -- of the 20 Escape in the -- behind the back seat. They were -- 21 I want to say the camping chairs were on the bottom 22 cause we don't ever use those, and then the umbrella 23 and shop vac were on the top. So everything of that 24 was in the back of it. And then the bag of clothes, 25 I want to say it was in the back.</p>
<p style="text-align: right;">Page 34</p> <p>1 A But they did say he would grow out of it by 2 age five. And it's already gotten better since he 3 was born. He got tested -- retested again in 4 February. 5 Q Okay. I'm going to hand you what we marked 6 as Defendant's Exhibit 3 in Josh's deposition and 7 just -- I'm going to ask you the same questions about 8 the, the cargo contents that were in the Escape at 9 the time of the accident and just try to see if you 10 remember what side of the vehicle or where they were 11 located. So just, obviously, do the best you can. I 12 know it's been a long time. And your memory from 13 that night, I know, is -- you don't, you don't have a 14 lot of memory from that night. 15 MS. CANNELLA: I'm sorry. Can we take a 16 quick break? 17 MS. FERGUSON: Sure. 18 MS. CANNELLA: Do you mind? 19 MS. FERGUSON: I don't mind. We'll go off 20 record. 21 THE VIDEOGRAPHER: The time is 1:50 p.m. 22 We're off record. 23 (Whereupon, a brief recess was taken.) 24 THE VIDEOGRAPHER: The time is 1:54 p.m. 25 And we are on the record.</p>	<p style="text-align: right;">Page 36</p> <p>1 The only thing that I remember being in the 2 back seat is, like, there was a plant, like a little 3 spider plant in the passenger floorboard, and then a 4 truck; little toy truck. That was the only thing 5 that was left in the back seat. 6 Q Okay. But no memory of what side of the 7 vehicle the shop vac was on: Left? Right? 8 A No memory of what side either of these were 9 on. I honestly just throw stuff in my car, so... 10 Q Okay. Do you have a recollection of where 11 you all purchased the car seat that Cohen was in at 12 the time of the accident? 13 A We got it from Sam's Club. 14 Q Sam's Club? 15 A Yes. 16 Q Okay. 17 A Somebody had posted on Facebook about them 18 having a deal and I got it from there. And that's 19 why I remember; cause I got a good deal. 20 Q Okay. Do you remember who first installed 21 that car seat? 22 A I did. 23 Q You did? 24 A Mm-hmm. 25 Q Okay. And, and was it first installed in</p>

SANTANA BRYSON
BRYSON vs ROUGH COUNTRYApril 12, 2023
37-40

<p style="text-align: right;">Page 37</p> <p>1 the Ford Escape?</p> <p>2 A Yes.</p> <p>3 Q Okay. And when it was first used -- it</p> <p>4 sounds like based on discovery response it was around</p> <p>5 August 15th, 2018, or is that just when you think you</p> <p>6 bought it?</p> <p>7 A We wouldn't have used it till he was about</p> <p>8 a year old cause I didn't -- I don't switch my kids</p> <p>9 over forward-facing until they're almost a year. So</p> <p>10 I want to say probably at the end of 2018, I want to</p> <p>11 say. August or September does sound pretty right</p> <p>12 that I would put it in there. He was -- it would</p> <p>13 have been forward-facing if he was after six months.</p> <p>14 Q Okay. Forward-facing after six months.</p> <p>15 And when you -- I mean, how did you know</p> <p>16 how to install that car seat?</p> <p>17 A The car seat manual. They have pictures in</p> <p>18 it and that. And then, I mean, it's kind of just</p> <p>19 commonsense how to buckle a car seat up if you've had</p> <p>20 children or babysat children.</p> <p>21 Q Okay. And so it sounds like from the time</p> <p>22 you all bought that car seat, I think it sounds</p> <p>23 like -- you correct me if I'm wrong -- you used it</p> <p>24 forward-facing?</p> <p>25 A I did. Yes.</p>	<p style="text-align: right;">Page 39</p> <p>1 out and then you can answer. So what I -- and that</p> <p>2 may have been a bad question the first time, but what</p> <p>3 I'm trying to ask is the type of car seat that Cohen</p> <p>4 was in at the time of the accident.</p> <p>5 Prior to the -- you installing his</p> <p>6 particular car seat, did you have experience</p> <p>7 installing other similar car seats?</p> <p>8 A Yes.</p> <p>9 Q Okay. From what?</p> <p>10 A From babysitting my cousins and nieces and</p> <p>11 nephews -- I've installed their car seats multiple</p> <p>12 times -- and I used to babysit on the weekends for</p> <p>13 other people. So like from the time I was probably</p> <p>14 14 to now I've babysat kids on and off.</p> <p>15 Q Okay. Did -- to your knowledge, did</p> <p>16 Cohen -- was he ever diagnosed with any kind of</p> <p>17 health, health conditions, diseases, health issues</p> <p>18 that were --</p> <p>19 A No. He was perfectly healthy.</p> <p>20 Q Okay. And he was not in preschool at the</p> <p>21 time of the accident, but would stay with your</p> <p>22 grandmother --</p> <p>23 A Mm-hmm.</p> <p>24 Q -- when you worked?</p> <p>25 A (Witness nods head.)</p>
<p style="text-align: right;">Page 38</p> <p>1 Q Okay. So it was never -- to your</p> <p>2 knowledge. I mean, I'm not --</p> <p>3 A No. Cause once I switched him over, he was</p> <p>4 just -- he would be forward-facing. I wouldn't put</p> <p>5 him back in the infant. And the infant would have</p> <p>6 been rear-facing, so...</p> <p>7 Q Okay. Prior to installing that car seat,</p> <p>8 had you ever installed -- like not the bucket type,</p> <p>9 but the -- I guess you would call it a toddler car</p> <p>10 seat prior to that one --</p> <p>11 MS. CANNELLA: Object --</p> <p>12 Q (BY MS. FERGUSON) -- for Cohen?</p> <p>13 MS. CANNELLA: Object to the form of the</p> <p>14 question as vague.</p> <p>15 THE WITNESS: Like a five-point car, car</p> <p>16 seat? Like a five-point-harness car seat?</p> <p>17 Q (BY MS. FERGUSON) Well, had you installed a</p> <p>18 similar one to the one that Cohen had --</p> <p>19 A Oh, yeah. I've babysat on mult --</p> <p>20 Q Sorry. Just so we're not talking over each</p> <p>21 other.</p> <p>22 A Oh, yeah. Sorry.</p> <p>23 Q I'm not trying to be mean.</p> <p>24 A No. I forget. I'm sorry.</p> <p>25 Q It's okay. Let me just get the question</p>	<p style="text-align: right;">Page 40</p> <p>1 Q Okay. Tell me what you remember about the</p> <p>2 two prior accidents that you were involved in where</p> <p>3 the, the car seat that Cohen was in at the time of</p> <p>4 the March 2020 accident was also being used.</p> <p>5 A The first one was when we were at a yield</p> <p>6 sign in our Ford Escape. And the driver in front of</p> <p>7 me, he let off his brakes like he was about to go and</p> <p>8 then slammed back on. And I rear-ended him because I</p> <p>9 thought he was going. It was just a bump. And we</p> <p>10 pulled over, called the police, and he made sure we</p> <p>11 were both okay.</p> <p>12 Even the defendant -- or the other person</p> <p>13 that I hit/rear-ended, he, he said everything was</p> <p>14 fine. And we -- I'm pretty sure I got a ticket for</p> <p>15 following too closely, but that's just -- the police</p> <p>16 literally told me that's just because he had to issue</p> <p>17 some sort of citation because I did rear-end the</p> <p>18 person. So other than that, everything was fine.</p> <p>19 And our insurance didn't make a claim because there</p> <p>20 was no damage on either vehicles. And we didn't have</p> <p>21 to go to the hospital cause we were not hurt.</p> <p>22 And then the second one, we were just</p> <p>23 driving. And we stopped at a red light and a lady</p> <p>24 just barely tapped us. Didn't even jar our car or</p> <p>25 the trailer or anything. Like we got out, she was</p>

SANTANA BRYSON
BRYSON vs ROUGH COUNTRY

April 12, 2023

41-44

<p style="text-align: right;">Page 41</p> <p>1 okay and the trailer was okay, and we didn't even 2 make a police call because it barely -- like she 3 barely even tapped us. 4 Q Okay. And that accident you all were in, 5 in the Jeep? 6 A The Jeep. Yes. 7 Q Okay. What kind of Jeep; do you know? 8 A I think it's the Cherokee Jeep is what it 9 is, I believe. The soft-top Jeep Cherokee. It's an 10 older model. It's a two door. 11 Q When you say "soft-top," meaning you can 12 actually remove -- 13 A You can take it off and the side of the 14 doors off. Yes. 15 Q Did you all have the -- 16 A No. 17 Q -- doors off? 18 A Everything -- I'm sorry. 19 Q It's okay. 20 Did you all have the -- any of the, the 21 roof or doors off at the time of the accident? 22 A No. 23 Q And that Jeep belongs to your -- I know 24 Josh told me this and I keep messing up if it's your 25 uncle or grandfather that owns it.</p>	<p style="text-align: right;">Page 43</p> <p>1 Q Normal size? 2 A Yes. 3 Q Okay. I'm going to hand you what was 4 marked as Defendant's 2 in Josh's deposition. And I 5 think the record will reflect the witness list is the 6 same for your discovery responses. Regardless, I 7 just want to ask you what I asked him earlier about 8 whether you personally knew any of the witnesses that 9 have been listed before the accident. 10 So I'll hand you this. You see Exhibit 2 11 on the front. And then my questions will be about 12 page -- starting at page 2. 13 MS. CANNELLA: Okay. So PX 2 is Josh's 14 response from September 26, 2022. 15 Q (BY MS. FERGUSON) Are you on page 2? 16 A Yes. I'm looking at it. 17 Q All right. For the scene witnesses, other 18 than Josh, did you know any of those other folks that 19 are listed as scene witnesses prior to the accident? 20 A No, ma'am. 21 Q Have you had contact with any of those 22 witnesses since the accident? 23 A No. 24 Q And then what about investigating officer? 25 coroner? Did you know either of those individuals</p>
<p style="text-align: right;">Page 42</p> <p>1 A Grandfather. 2 Q Grandfather. 3 Okay. And he still has the Jeep? 4 A Yes. 5 Q Okay. And your grandfather and 6 grandmother, do they live in Cedartown? 7 A Yes. 8 Q Okay. What county is that? 9 A It's Polk County, but they live on the 10 Floyd County line. So their address is Cedartown, 11 but they're in Floyd County. 12 Q Okay. 13 A It's, it's crazy. 14 Q Okay. And is that Jeep, your 15 grandfather's, is it his primary vehicle that he 16 drives? 17 A He doesn't really drive it anymore. But 18 when he does, he'll just go out on the road to his 19 friend's house and back. That's it. It's, like, his 20 joy vehicle. 21 Q How long has he had it? 22 A I'm not sure, to be honest. More than 23 eight years. 24 Q Does the Jeep have oversized tires on it? 25 A No.</p>	<p style="text-align: right;">Page 44</p> <p>1 before the accident? 2 A No, ma'am. 3 Q Have you had any contact with them since 4 the accident? 5 A No, ma'am. 6 Q Okay. The next page, if you want to look 7 at the medical examiner and then medical providers 8 that are listed under the first three headings. 9 Eisenstat, Padgett, Cornelius, Carrington, 10 Nagle, did you know any of those individuals before 11 the accident? 12 A No, ma'am. 13 Q And have you had contact with any of those 14 individuals since the accident? 15 A No, ma'am. 16 Q Okay. And then the last category, persons 17 with knowledge of the subject F-250. And there's a 18 number of individuals listed. 19 Did you know any of those people prior to 20 the subject accident? 21 A No, ma'am. 22 Q Have you talked with any of them since the 23 subject accident? 24 A No. 25 Q And have you ever bought, leased, or had a</p>

SANTANA BRYSON
BRYSON vs ROUGH COUNTRYApril 12, 2023
45-48

<p style="text-align: right;">Page 45</p> <p>1 car serviced at Ronnie Thompson Ford?</p> <p>2 A No.</p> <p>3 Q Any other contact with Ronnie Thompson Ford</p> <p>4 at any time?</p> <p>5 A No, ma'am.</p> <p>6 Q Okay. Okay. I am going to hand you what</p> <p>7 I've marked as Defendant's Exhibit 5. It's almost</p> <p>8 identical to what you were just looking at, but this</p> <p>9 is your responses to the first interrogatories.</p> <p>10 And if you could, when you get a chance,</p> <p>11 turn to interrogatory number 5.</p> <p>12 (Whereupon, the court reporter</p> <p>13 marked Defendant's Exhibit No. 5 for</p> <p>14 identification.)</p> <p>15 A Okay.</p> <p>16 Q All right. In this interrogatory we asked</p> <p>17 about prior convictions, as shown on the</p> <p>18 interrogatory.</p> <p>19 And I just want to confirm in response the</p> <p>20 answer where you state, Plaintiff Santana Bryson</p> <p>21 states that she has never been convicted of a felony</p> <p>22 or a crime of moral turpitude; is that accurate?</p> <p>23 A Yes.</p> <p>24 Q Okay. Ever been convicted of any other</p> <p>25 crimes? Again, not looking for traffic tickets,</p>	<p style="text-align: right;">Page 47</p> <p>1 Q Okay. For the bracelets, the Chandler</p> <p>2 Strong, Forever Loved Cohen Zayne bracelets that were</p> <p>3 made, it sounds like a fundraiser for you all.</p> <p>4 Do you know how much money was raised for</p> <p>5 those?</p> <p>6 A I don't know. The bracelets and T-shirts</p> <p>7 were sold together as one; like one person was doing</p> <p>8 them.</p> <p>9 Q Mm-hmm.</p> <p>10 A I don't think it was near as much as what</p> <p>11 Josh was saying, though. Those, those didn't have a</p> <p>12 big revenue like the donation page did. But if I</p> <p>13 had -- I don't really recall an actual amount, to be</p> <p>14 honest.</p> <p>15 Q Okay. It sounds like you all have bought a</p> <p>16 new car since the accident.</p> <p>17 The Ford Flex, right?</p> <p>18 A Mm-hmm.</p> <p>19 Q Okay. Any medical expenses or other</p> <p>20 accident-related expenses that you can think of that</p> <p>21 you all have paid out of pocket?</p> <p>22 A No. Not out of pocket.</p> <p>23 Q And the house that you all live in now you</p> <p>24 own?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 46</p> <p>1 traffic citations; anything like that.</p> <p>2 A No. I haven't been.</p> <p>3 Q Okay. I asked Josh earlier about some of</p> <p>4 the charity events that were organized to help</p> <p>5 support your family after the accident. And I'm</p> <p>6 going to ask you just some similar questions with</p> <p>7 regard to the GoFundMe account.</p> <p>8 A (Witness nods head.)</p> <p>9 Q Do you have an estimate of how much money</p> <p>10 was raised for you all through that?</p> <p>11 A No, I don't. There was actually two</p> <p>12 GoFundMes that my sister started and his cousin</p> <p>13 started, so I don't re -- I don't recall the actual</p> <p>14 total amount. No.</p> <p>15 Q What's your cousin's name that started one?</p> <p>16 A Sierra Nichols. Sorry. I couldn't</p> <p>17 remember her last name. She's married now, so it</p> <p>18 might not be the same thing.</p> <p>19 Q Okay. And then his sister, is it Kristin?</p> <p>20 A It's my sister.</p> <p>21 Q Your sister? I'm sorry.</p> <p>22 A Alana Carroll. A-L-A-N-A, C-A-R-R-O-L-L.</p> <p>23 Q Where does she live?</p> <p>24 A In Armuchee, Georgia; Rome, Georgia. It's</p> <p>25 part of Rome.</p>	<p style="text-align: right;">Page 48</p> <p>1 Q Okay. Do you all have a mortgage on the</p> <p>2 house, or own it outright?</p> <p>3 A Mortgage.</p> <p>4 Q Okay. Have you ever owned a vehicle with a</p> <p>5 suspension lift kit on it?</p> <p>6 A No.</p> <p>7 Q Have you ever driven a vehicle with a</p> <p>8 sus -- with a lift kit on it?</p> <p>9 A No.</p> <p>10 Q Have you ever been a pass -- driven --</p> <p>11 passenger in a vehicle that had a lift kit on it?</p> <p>12 A Yes.</p> <p>13 Q Approximately how many times would you say?</p> <p>14 MS. CANNELLA: Objection. Calls for</p> <p>15 speculation.</p> <p>16 THE WITNESS: Handful of times. Not very</p> <p>17 many.</p> <p>18 Q (BY MS. FERGUSON) Who -- whose vehicles, if</p> <p>19 it was a handful of times? Was it one specific</p> <p>20 vehicle, or different ones?</p> <p>21 A Just a, a friend; an ex-boyfriend.</p> <p>22 Q What kind of vehicle did he have?</p> <p>23 A I'm not sure. It was a truck.</p> <p>24 Q Do you remember the size of the lift on</p> <p>25 that truck?</p>

SANTANA BRYSON
BRYSON vs ROUGH COUNTRYApril 12, 2023
49-52

<p style="text-align: right;">Page 49</p> <p>1 A No. It was when I was a teenager, so --</p> <p>2 Q In high school still?</p> <p>3 A Yeah. I was in high school. So I don't, I</p> <p>4 don't really recall.</p> <p>5 Q What was the boyfriend's name?</p> <p>6 A Jacob Taylor.</p> <p>7 Q Okay. How long did you all date?</p> <p>8 A It was, like, young love; like middle</p> <p>9 school, high school. So like four or five years on</p> <p>10 and off.</p> <p>11 Q Did he ever tell you why he had his truck</p> <p>12 lifted?</p> <p>13 A He thought it was cool.</p> <p>14 Q Did you have other friends in high school</p> <p>15 that had lifted pickup trucks?</p> <p>16 A Not my friends. No.</p> <p>17 Q Other people that went to your high school</p> <p>18 that had lifted pickup trucks that you remember?</p> <p>19 A I would say maybe one or two other ones.</p> <p>20 Yeah. There wasn't very many that I can recall.</p> <p>21 Q I've never been to Shannon, Georgia.</p> <p>22 So would you, would you classify that as</p> <p>23 being in the country, or not?</p> <p>24 A Yes.</p> <p>25 Q Okay. And that's, that's the area you grew</p>	<p style="text-align: right;">Page 51</p> <p>1 A No. Not to my knowledge.</p> <p>2 Q Okay. And when you dated Jacob Taylor and</p> <p>3 rode in his lifted pickup truck, did you all ever do</p> <p>4 stuff like go mudding, or off-roading, or anything</p> <p>5 like that?</p> <p>6 A I need to clarify. I never rode in it. I</p> <p>7 just sat in it. Yeah. I never rode in it.</p> <p>8 Q Okay.</p> <p>9 A I just sat in it.</p> <p>10 Q Sat in it. Okay.</p> <p>11 A One time. I never actually, like, rode on</p> <p>12 the road with it. I didn't feel comfortable doing</p> <p>13 it. I just -- I literally sat in the driver's side</p> <p>14 at the Shannon post office. That's literally all I</p> <p>15 did. He would drive it.</p> <p>16 Q Okay. Turning to Hunter Elliott, the</p> <p>17 driver of the F-250 that hit you all, at some point</p> <p>18 in time you came to learn that he was driving under</p> <p>19 the influence when he hit you all, correct?</p> <p>20 A Mm-hmm.</p> <p>21 Q How did you find out that information?</p> <p>22 A I want to say I was told by somebody in the</p> <p>23 hospital.</p> <p>24 Q Okay.</p> <p>25 A That's, that's what I can remember is</p>
<p style="text-align: right;">Page 50</p> <p>1 up in?</p> <p>2 A Yes.</p> <p>3 Q Okay. Are lifted trucks pretty common in</p> <p>4 Shannon, Georgia area?</p> <p>5 A I wouldn't say "common," but they're not</p> <p>6 irrelevant either. I would say maybe like two out of</p> <p>7 ten cars that you would see maybe.</p> <p>8 Q Are lifted?</p> <p>9 A Yes.</p> <p>10 Q Okay. And the boyfriend Jacob Taylor that</p> <p>11 had the lifted truck, is that the vehicle he drove</p> <p>12 the whole time that you all were dating?</p> <p>13 A No. It was, it was just a truck that he</p> <p>14 kept for a very short period of time. His dad had</p> <p>15 got it for him. And he just drove it for maybe like</p> <p>16 a month or two and then the lift broke on it, so he</p> <p>17 had to sell it.</p> <p>18 Q And when you -- what do you mean by "the</p> <p>19 lift broke"?</p> <p>20 A I don't know. I just was told that the</p> <p>21 lift broke, so he sold it. That's all I know about</p> <p>22 that.</p> <p>23 Q Okay. Aside from Jacob Taylor, do you have</p> <p>24 any family members that have ever had lifted trucks,</p> <p>25 to your knowledge?</p>	<p style="text-align: right;">Page 52</p> <p>1 somebody told me in the hospital. I don't know who</p> <p>2 told me. Like I said, our memory is very hazy.</p> <p>3 Literally, that whole week after the car wreck is</p> <p>4 still hazy. I was on a lot of medication, so I</p> <p>5 really don't know who told me.</p> <p>6 Q I asked Josh a similar question earlier. I</p> <p>7 told him that I've seen some of the Facebook posts by</p> <p>8 you and Josh just stating that a drunk driver caused</p> <p>9 the accident that you all were involved in.</p> <p>10 And do you fault Hunter Elliott for causing</p> <p>11 the accident?</p> <p>12 A Yes, but not for the entirety. There's a</p> <p>13 lot of plays that come into this situation and him</p> <p>14 being one of them, the truck being one of them, the</p> <p>15 speed being one of them, the phone being one of them.</p> <p>16 Q What were you told about him and the phone?</p> <p>17 MS. CANNELLA: Object to the form of the</p> <p>18 question.</p> <p>19 To the extent it calls for conversations</p> <p>20 between us, don't answer the question. But if</p> <p>21 you know otherwise, then --</p> <p>22 MS. FERGUSON: Right.</p> <p>23 MS. CANNELLA: -- answer.</p> <p>24 Q (BY MS. FERGUSON) Any of -- and in any of</p> <p>25 these questions I'm not looking for stuff that you</p>



SANTANA BRYSON
BRYSON vs ROUGH COUNTRYApril 12, 2023
53-56

<p style="text-align: right;">Page 53</p> <p>1 lawyer has told you and that's the only way you have</p> <p>2 the information is through her. So --</p> <p>3 A Oh, okay.</p> <p>4 Q -- if you know through, like, a police</p> <p>5 report or reviewing something -- you know, any</p> <p>6 materials that you reviewed for the depo or at any</p> <p>7 other time, then that's what I'm asking for; not any</p> <p>8 attorney-client communications.</p> <p>9 A I'm almost positive it was my mother-in-law</p> <p>10 who told me that she found out from one of the police</p> <p>11 officers.</p> <p>12 Q That he was --</p> <p>13 A On his phone during the car accident.</p> <p>14 Q Okay.</p> <p>15 A From my memory, that's what I remember.</p> <p>16 Q And did you go to his -- I don't know if</p> <p>17 there were plea and sentencing hearings, or if it was</p> <p>18 one or two different things.</p> <p>19 But did you go to those hearings to the</p> <p>20 extent --</p> <p>21 A Yes.</p> <p>22 Q -- that, that you were aware of them?</p> <p>23 Okay. And did you have to testify or give</p> <p>24 an impact statement?</p> <p>25 A Nope. I didn't want to.</p>	<p style="text-align: right;">Page 55</p> <p>1 MS. FERGUSON: Thank you for letting us</p> <p>2 know that, though.</p> <p>3 MS. CANNELLA: Yes. Thank you.</p> <p>4 MS. FERGUSON: I need -- let's take a quick</p> <p>5 break.</p> <p>6 MS. CANNELLA: Okay.</p> <p>7 THE VIDEOGRAPHER: The time is 2:20 p.m.</p> <p>8 And we are off the record.</p> <p>9 (Whereupon, a brief recess was taken.)</p> <p>10 THE VIDEOGRAPHER: The time is 2:41 p.m.</p> <p>11 And we are on the record.</p> <p>12 Q (BY MS. FERGUSON) Okay. Santana, we are</p> <p>13 almost done. I just have a few things that I need to</p> <p>14 follow up on. I forgot to ask earlier.</p> <p>15 Do you remember the date of Cohen's</p> <p>16 funeral?</p> <p>17 A No. Like we were in the hospital for five</p> <p>18 days, and then three days after that they wouldn't</p> <p>19 let me release cause you have to stay in the hospital</p> <p>20 for a C-section. So I want to say it was like a week</p> <p>21 and a half afterwards. It was a very bad day for me,</p> <p>22 so I didn't even know what day was what back then.</p> <p>23 Q Excuse me. Is there -- I asked Josh this</p> <p>24 same question earlier.</p> <p>25 But if -- in your own words, you know, how</p>
<p style="text-align: right;">Page 54</p> <p>1 Q Okay. I've seen, I think, two -- or seen</p> <p>2 them in a transcript for, I believe, grandmothers;</p> <p>3 two grandmothers, two relatives. And so I was just</p> <p>4 trying to figure out if maybe I just hadn't seen them</p> <p>5 from you two.</p> <p>6 But it sounds like you did not give one?</p> <p>7 A I didn't have anything to say to him.</p> <p>8 Q Okay.</p> <p>9 A And my grandmother and my aunt was the one</p> <p>10 who --</p> <p>11 Q Grandma and aunt.</p> <p>12 A -- spoke.</p> <p>13 Yes. Rissa and Stacey.</p> <p>14 Q You were there when they gave those</p> <p>15 statements, though?</p> <p>16 A Yes.</p> <p>17 Q Okay.</p> <p>18 THE VIDEOGRAPHER: I just want counsel to</p> <p>19 be aware, you know, audio is leaking pretty bad</p> <p>20 from the other rooms, so --</p> <p>21 MS. CANNELLA: Okay.</p> <p>22 THE VIDEOGRAPHER: -- yeah.</p> <p>23 MS. FERGUSON: I don't think there's</p> <p>24 anything we can do.</p> <p>25 MS. CANNELLA: No.</p>	<p style="text-align: right;">Page 56</p> <p>1 would you describe Cohen; just personality, likes,</p> <p>2 things that you thought were special about him?</p> <p>3 A He was very outgoing. Everybody loved him.</p> <p>4 Very energetic. Sorry.</p> <p>5 Q That's okay.</p> <p>6 A He was a mama's boy, but loved playing with</p> <p>7 daddy too. Like we would always go outside and play</p> <p>8 basketball together. He was going to be the next</p> <p>9 LeBron James, I swear. He could shoot a basketball</p> <p>10 from across his room into his little basketball goal.</p> <p>11 He loved playing with his little toys outside and he</p> <p>12 loved his dog. He was just the perfect little boy.</p> <p>13 Q Okay. Thank you for sharing that.</p> <p>14 I don't think I have any other questions.</p> <p>15 Thank you again for your patience. And I</p> <p>16 know this is a terrible process to go through, but</p> <p>17 thank you.</p> <p>18 MS. CANNELLA: Okay.</p> <p>19 THE WITNESS: Thank you.</p> <p>20 MS. FERGUSON: All right.</p> <p>21 MS. CANNELLA: We'll read and sign.</p> <p>22 THE VIDEOGRAPHER: This concludes this</p> <p>23 video deposition. The time is 2:42 p.m. And we</p> <p>24 are off the record.</p> <p>25 (Deposition concluded at 2:42 p.m.)</p>

**SANTANA BRYSON
BRYSON vs ROUGH COUNTRY**

April 12, 2023

57-60

Page 57	Page 59																																																																								
<p style="text-align: center;">ERRATA PAGE</p> <p>Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or Georgia Code Annotated 9-11-30(e), any changes in form or substance which you desire to make to your deposition testimony shall be entered upon the deposition with a statement of the reasons given for making them.</p> <p>To assist you in making any such corrections, please use the form below. If supplemental or additional pages are necessary, please furnish same and attach them to this errata sheet.</p> <p>I, the undersigned, SANTANA BRYSON, hereby certify under penalty of perjury that I have read the foregoing deposition and that said deposition is true and accurate, with the exception of the changes noted below, if any.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">Page</th> <th style="width: 15%;">Line</th> <th style="width: 15%;">Change</th> <th style="width: 15%;">Reason</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Page	Line	Change	Reason																																																																	<p style="text-align: center;">CERTIFICATE</p> <p>STATE OF GEORGIA:</p> <p>COUNTY OF DEKALB:</p> <p>I hereby certify that the foregoing transcript was taken down as stated in the caption, that the witness was first duly sworn, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 56 represent a true, correct, and complete transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case. The witness did reserve the right to read and sign the transcript.</p> <p style="text-align: center;">This, the 13th day of April, 2023.</p> <div style="text-align: center;">  LOUISE GRIFFITH, CCR-B-2121 Certified Court Reporter </div>				
Page	Line	Change	Reason																																																																						
<p style="text-align: center;">Page 58</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">Page</th> <th style="width: 15%;">Line</th> <th style="width: 15%;">Change</th> <th style="width: 15%;">Reason</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table> <p style="text-align: center;">SANTANA BRYSON</p> <p>Sworn to and subscribed before me</p> <p>Notary Public, this _____ day of _____, 2023.</p> <p>My commission expires: _____</p>	Page	Line	Change	Reason																																																																					<p style="text-align: center;">Page 60</p> <p style="text-align: center;">COURT REPORTER DISCLOSURE</p> <p>Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:</p> <p>I am a Georgia Certified Court Reporter. I am here as a representative of Regency-Brentano, Inc.</p> <p>I am not disqualified for a relationship of interest under the provisions of O.C.G.A. §9-11-28 ©.</p> <p>Regency-Brentano, Inc. was contacted by the offices of Esquire Deposition Solutions to provide court reporting services for this deposition.</p> <p>Regency-Brentano, Inc. will not be taking this deposition under any contract that is prohibited by O.C.G.A. §15-14-37 (a) and (b).</p> <p>Regency-Brentano, Inc. has no exclusive contract to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition.</p> <p>Regency-Brentano, Inc. will charge its usual and customary rates to all parties in the case, and a financial discount will not be given to any party to this litigation.</p> <div style="text-align: center;">  Louise Griffith, CCR-B-2121 </div>
Page	Line	Change	Reason																																																																						